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July 11, 2024

BY ECF

Hon. Katherine Polk Failla
United States District Court
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v. Nadine Wade, Ind. #: 21 Cr. 472 (KPF)

Dear Judge Failla:

I write to request a temporary modification to the curfew condition of my client's bail to permit her to take a job caring for the dog of a woman who is going out of town. My client informs me she will earn \$55 per day if permitted to accept the assignment, and wishes to do so. I have spoken by phone to Ms. Wade's local Pre-Trial Services Officer in Michigan, Officer Demetrius Hardy, who informs me he has no objection to the instant request being approved by this Court. The government, by AUSA Matthew King, also has no objection.

Ms. Wade informs me that doing the dog-sitting job will require her to live at the home of the dog owner at 1001 Berkshire Road, Ann Arbor, Michigan, 12 miles from Ms. Wade's own residence. She would reside in the subject private home beginning July 13 and concluding July 20, 2024. She is amenable to any check-in conditions Pre-Trial may impose on her during the term, and agrees to the applicability of the curfew condition while she is in Ann Arbor, but requests an extension of her morning time from 9:00 AM to 7 AM to walk the dog in the morning.

Because Ms. Wade seeks to earn money to support herself which she would have to forego by strict application of her bail conditions, it is respectfully requested that the curfew requirement be temporarily modified as set forth herein. Thank you very much for your attention.

Sincerely,

Robert A. Soloway

Robert A. Soloway

RAS:sc

Application GRANTED. The conditions of Ms. Wade's pre-trial release are hereby temporarily modified, from **July 13, 2024** to **July 20, 2024**, to reflect the above arrangements, including the requirement that Ms. Wade comply with any check-in conditions that Pre-Trial may deem necessary during the relevant period.

The Clerk of Court is directed to terminate the pending motion at docket entry 331.

Dated: July 11, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE